

CAIRNCROSS & HEMPELMANN
JOHN RIZZARDI (*pro hac vice*)
524 Second Avenue, Suite 500
Seattle, WA 98104-2323
Telephone: (206) 254-4444
Facsimile: (206) 587-2308
JRizzardi@cairncross.com
Attorneys for Claimants

THOMAS MELONE (*pro hac vice*)
ALLCO RENEWABLE ENERGY LIMITED
157 Church St., 19th Floor
New Haven, CT 06510
Telephone: (212) 681-1120
Facsimile: (801) 858-8818
Thomas.Melone@AllcoUS.com
Attorneys for Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC
COMPANY,

Reorganized Debtors,

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**REPLY DECLARATION OF THOMAS
MELONE IN SUPPORT OF
OPPOSITION TO REORGANIZED
DEBTORS' ONE HUNDRED EIGHTH
OBJECTION TO CLAIMS (PURPA
CLAIMS) BY WINDING CREEK
SOLAR LLC, FOOTHILL SOLAR LLC,
HOLLISTER SOLAR LLC,
KETTLEMAN SOLAR LLC, VINTNER
SOLAR LLC, BEAR CREEK SOLAR
LLC, and ALLCO RENEWABLE
ENERGY LIMITED**

**Date: March 2, 2022
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102**

1 I, Thomas Melone, declare as follows:

2 1. I am President of Allco Renewable Energy Limited ("Allco"). I represent the
3 Claimants Winding Creek Solar LLC, Foothill Solar LLC, Hollister Solar LLC, Kettleman Solar
4 LLC, Vintner Solar LLC, Bear Creek Solar LLC, and Allco (collectively, the "Claimants"). The
5 facts set forth herein are based on my personal knowledge and if called as a witness I could
6 competently testify thereto. This declaration is being provided in support of the Claimants' Sur-
7 reply Memorandum of Points and Authorities in Opposition to Reorganized Debtors' One
8 Hundred Eighth Objection to Claims (PURPA Claims).

9 2. Attached hereto as Exhibit A is PG&E's published list of contracts issued under
10 the E-SRG and E-PWF programs, which is available at
11 [https://www.pge.com/includes/docs/word_xls/b2b/energysupply/wholesaleelectricssuppliersolicit](https://www.pge.com/includes/docs/word_xls/b2b/energysupply/wholesaleelectricssuppliersolicitation/standardcontractsforpurchase/Contract_Updates_Spreadsheet.xls)
12 [ation/standardcontractsforpurchase/Contract_Updates_Spreadsheet.xls](https://www.pge.com/includes/docs/word_xls/b2b/energysupply/wholesaleelectricssuppliersolicitation/standardcontractsforpurchase/Contract_Updates_Spreadsheet.xls).

13
14 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE
15 OF FLORIDA THAT THE FOREGOING IS TRUE AND CORRECT.

16 EXECUTED this 17th day of February, 2022, at Delray Beach, Florida.

17 
18 THOMAS MELONE

EXHIBIT A

Project Name	E-SRG or E-PWF	Status	Capacity (kW)	Expected GWh/yr	Technology	Price (\$/MWh)	Vintage	Term (yrs)	Location	Execution Date	18-month COD Deadline	Current GCOD**	Actual COD	Achieved COD with 18 months
Buckeye Hydroelectric Project	E-SRG	Online	400	0-2.0	Small Hydro	\$82.71	Existing	20	El Dorado County	6/2/2008	12/2/2009	N/A	8/15/2008	Yes
Tunnel Hill Hydroelectric Project	E-SRG	Online	600	0-3.0	Small Hydro	\$96.96	Existing	20	El Dorado County	6/2/2008	12/2/2009	N/A	5/22/2009	Yes
Castelanelli Bros. Biogas	E-SRG	Online	300	0-1.3	Digester Gas	\$100.43	Existing	10	Lodi	6/11/2009	12/11/2010	N/A	6/17/2009	Yes
Nevada Irrigation District (Comble North Powerhouse)	E-SRG	Online	500	0-1.3	Small Hydro	\$105.37	Existing	15	Grass Valley	5/28/2009	11/28/2010	N/A	10/6/2009	Yes
Snow Mountain Hydro, LLC (Lost Creek 1)	E-SRG	Online	1,100	0-5.5	Small Hydro	\$101.75	Existing	10	Shasta County	12/18/2009	6/18/2011	N/A	1/1/2010	Yes
Snow Mountain Hydro, LLC (Lost Creek 2)	E-SRG	Online	500	0-2.5	Small Hydro	\$101.75	Existing	10	Shasta County	12/18/2009	6/18/2011	N/A	1/1/2010	Yes
Nevada Irrigation District (Comble South Powerhouse)	E-SRG	Online	1,500	0-3.9	Small Hydro	\$101.75	Existing	10	Grass Valley	11/23/2009	5/23/2011	N/A	5/1/2010	Yes
Nevada Irrigation District (Scotts Flat Dam)	E-SRG	Online	850	0-3.2	Small Hydro	\$84.48	Existing	10	Nevada City	4/6/2010	10/6/2011	N/A	6/1/2010	Yes
Sierra Green Energy, LLC (SGE Site 1)	E-SRG	Online	38	0-0.2	Small Hydro	\$113.90	New	20	Grass Valley	12/24/2009	6/24/2011	N/A	6/24/2010	Yes
Santa Maria II	E-SRG	Online	1,420	0-6.2	Landfill gas	\$95.91	New	15	Santa Barbara County	8/6/2008	2/6/2010	N/A	9/13/2010	No
Blake's Landing Farms, Inc. (80 kw Generator)	E-SRG	Online	80	0-0.6	Digester Gas	\$84.48	Existing	10	Marin County	9/24/2010	3/24/2012	N/A	11/2/2010	Yes
Vecino Vineyards LLC	E-SRG	Online	330	0-0.1	Small Hydro	\$94.65	Existing	15	Mendocino County	3/1/2010	9/1/2011	N/A	4/1/2011	Yes
Ortigalita Power Company LLC	E-SRG	Online	750	0-5.6	Biomass	\$110.46	New	15	Merced County	5/27/2009	11/27/2010	N/A	6/17/2011	No
San Jose Water Company (Cox Ave Hydro)	E-SRG	Online	112	0-0.6	Small Hydro	\$100.98	Existing	20	Santa Clara County	8/17/2011	2/17/2013	N/A	11/22/2011	Yes
South Sutter Water (Vanop No. 1)	E-PWF	Online	395	0-2.0	Small Hydro	\$95.43	Existing	10	Placer County	12/23/2011	6/23/2013	N/A	1/24/2012	Yes
Twin Valley Hydro (T&G Hydro)	E-SRG	Online	520	0-2.6	Small Hydro	\$121.26	Existing	20	Whitmore	1/26/2010	7/26/2011	N/A	1/17/2012	No
Calaveras Public Utility District (Calaveras Hydro #1)	E-PWF	Online	90	0-0.4	Small Hydro	\$89.56	Existing	20	Calaveras County	3/9/2012	9/9/2013	N/A	4/1/2012	Yes
Calaveras Public Utility District (Calaveras Hydro #2)	E-PWF	Online	90	0-0.4	Small Hydro	\$89.56	Existing	20	Calaveras County	3/9/2012	9/9/2013	N/A	4/1/2012	Yes
Calaveras Public Utility District (Calaveras Hydro #3)	E-PWF	Online	90	0-0.4	Small Hydro	\$89.56	Existing	20	Calaveras County	3/8/2012	9/8/2013	N/A	4/1/2012	Yes
Jackson Valley Irrigation District (Jackson Valley Hydro)	E-PWF	Online	455	0-2.3	Small Hydro	\$89.56	Existing	20	Amador County	3/28/2012	9/28/2013	N/A	4/1/2012	Yes
American Energy, Inc. (Wolfert Bypass)	E-SRG	Online	980	0-4.9	Small Hydro	\$92.08	Existing	10	Merced	10/10/2011	4/11/2013	N/A	5/1/2012	Yes
American Energy, Inc. (San Luis Bypass)	E-SRG	Online	600	0-3.0	Small Hydro	\$92.08	Existing	10	Merced	10/10/2011	4/11/2013	N/A	5/1/2012	Yes
Brown's Valley Irrigation District (Virginia Ranch Dam)	E-PWF	Online	1,040	0-5.2	Small Hydro	\$76.88	Existing	10	Yuba County	3/22/2012	9/22/2013	N/A	4/12/2012	Yes
NHL1 Solar, LLC (Nickel 1)	E-SRG	Online	1,500	0-2.1	Solar PV	\$105.07	New	20	Kern County	7/15/2011	1/15/2013	N/A	11/28/2012	Yes
GASNA 16P, LLC (La Joya Del Sol #1)	E-SRG	Online	1,500	0-2.1	Solar PV	\$105.07	New	20	Fresno County	2/24/2011	8/24/2012	N/A	12/24/2012	No
Hayworth-Fabian LLC (Oakley Executive Solar)	E-SRG	Online	1,500	0-2.1	Solar PV	\$108.98	New	20	Contra Costa County	9/28/2011	3/26/2013	N/A	6/12/2013	No
Yolo County (Grassland 3)	E-PWF	Online	1,000	0-1.4	Solar PV	\$93.75	New	20	Yolo County	8/20/2012	2/20/2014	N/A	7/1/2013	Yes
Yolo County (Grassland 4)	E-PWF	Online	1,000	0-1.4	Solar PV	\$93.75	New	20	Yolo County	8/20/2012	2/20/2014	N/A	7/1/2013	Yes

Project Name	E-SRG or E-PWF	Status	Capacity (kW)	Expected GWh/yr	Technology	Price (\$/MWh)	Vintage	Term (yrs)	Location	Execution Date	18-month COD Deadline	Current GCOD**	Actual COD	Achieved COD with 18 months
Pristine Sun Mosaic LLC (2065_Rogers)	E-SRG	Online	250	0-0.7	Solar PV	\$108.98	New	20	Tehama County	8/17/2011	2/17/2013	N/A	7/12/2013	No
Toro Energy of California - SLO, LLC (Toro SLO Landfill)	E-SRG	Online	1,500	0-11.2	Landfill gas	\$108.98	New	20	San Luis Obispo County	8/31/2011	3/3/2013	N/A	7/21/2013	No
Pristine Mosaic, LLC (2158_Stroing)	E-SRG	Online	750	0-1.1	Solar PV	\$112.86	New	20	Tehama County	8/31/2011	3/3/2013	3/3/2014	10/2/2013	No
Tulare PV II LLC (Kingsburg 1)	E-SRG	Online	1,500	0-2.1	Solar PV	\$112.86	New	20	Tulare County	10/10/2011	4/11/2013	4/11/2014	12/30/2013	No
Tulare PV II LLC (Kingsburg 2)	E-SRG	Online	1,500	0-2.1	Solar PV	\$112.86	New	20	Tulare County	10/10/2011	4/11/2013	4/11/2014	12/30/2013	No
Tulare PV II LLC (Kingsburg 3)	E-SRG	Online	750	0-1.1	Solar PV	\$112.86	New	20	Tulare County	10/10/2011	4/11/2013	4/11/2014	12/30/2013	No
Fresh Air Energy IV, LLC (Sonora 1)	E-SRG	Online	1,500	0-1.4	Solar PV	\$112.86	New	20	Tuolumne County	7/15/2011	1/15/2013	1/15/2014	12/31/2013	No
Pristine Sun Mosaic, LLC (2179_Smotherman)	E-SRG	Online	250	0-0.7	Solar PV	\$112.86	New	20	Sutter County	8/31/2011	3/3/2013	3/3/2014	1/1/2014	No
Bear Creek Solar, LLC (Bear Creek Solar Project)	E-SRG	Online	1,500	0-2.1	Solar PV	\$112.86	New	20	San Joaquin County	8/31/2011	3/3/2013	3/3/2014	2/5/2014	No
Pristine Sun Fund 5, LLC (2102_Christensen)	E-SRG	Online	999	0-1.4	Solar PV	\$112.86	New	20	Fresno County	8/17/2011	2/17/2013	2/17/2014	2/7/2014	No
Pristine Sun Fund 5 LLC (2041_Alvares)	E-SRG	Online	250	0-0.4	Solar PV	\$112.86	New	20	Tehama County	8/31/2011	3/3/2013	3/3/2014	2/10/2014	No
Pristine Sun Fund 5, LLC (2103_Hill)	E-SRG	Online	750	0-1.1	Solar PV	\$112.86	New	20	San Luis Obispo County	8/31/2011	3/3/2013	3/3/2014	2/20/2014	No
Pristine Sun Fund 5, LLC (2096_Cotton)	E-SRG	Online	999	0-1.4	Solar PV	\$112.86	New	20	Butte County	8/31/2011	3/3/2013	3/3/2014	3/3/2014	No
Pristine Sun Fund 5, LLC (2056_Jardine)	E-SRG	Online	999	0-1.4	Solar PV	\$112.86	New	20	San Luis Obispo County	8/31/2011	3/3/2013	3/3/2014	3/3/2014	No
Pristine Sun Fund 5, LLC (2059_Scherz)	E-SRG	Online	500	0-1.1	Solar PV	\$112.86	New	20	San Luis Obispo County	8/31/2011	3/3/2013	3/3/2014	3/3/2014	No
Ignite Solar LLC (Achromawi)	E-SRG	Online	1,500	0-2.1	Solar PV	\$112.86	New	20	Shasta County	9/26/2011	3/26/2013	3/26/2014	3/5/2014	No
Ignite Solar LLC (Ahjumawi)	E-SRG	Online	1,500	0-2.1	Solar PV	\$112.86	New	20	Shasta County	9/26/2011	3/26/2013	3/26/2014	3/5/2014	No
Pristine Sun Fund 5, LLC (2094_Buzzelle)	E-SRG	Online	999	0-1.8	Solar PV	\$112.86	New	20	Butte County	8/31/2011	3/3/2013	3/3/2014	3/6/2014	No
Vinther Solar, LLC (Vinther Solar Project)	E-SRG	Online	1,500	0-2.1	Solar PV	\$112.86	New	20	San Luis Obispo County	10/10/2011	4/11/2013	4/11/2014	3/6/2014	No
Kettleman Solar, LLC (Kettleman Solar Project)	E-SRG	Online	1,000	0-1.4	Solar PV	\$112.86	New	20	San Joaquin County	10/10/2011	4/11/2013	4/11/2014	3/14/2014	No
Pristine Sun Fund 5, LLC (2081_Terzian)	E-SRG	Online	1,250	0-1.8	Solar PV	\$112.86	New	20	Fresno County	8/17/2011	2/17/2013	2/17/2014	6/17/2014	No
Enerparc CA1, LLC (San Benito Smart Park)	E-SRG	Online	1,499	0-2.1	Solar PV	\$112.86	New	20	San Benito County	9/26/2011	3/26/2013	3/26/2014	6/16/2014	No
Cloverdale Solar 1, LLC (FSEC1)	E-SRG	Online	1,500	0-2.1	Solar PV	\$108.98	New	20	Sonoma County	12/23/2011	6/23/2013	6/23/2014	6/26/2014	No
Pristine Sun Fund 5 LLC (2113_Fritzjarell)	E-SRG	Online	999	0-1.4	Solar PV	\$112.86	New	20	Shasta County	8/17/2011	2/17/2013	2/17/2014	6/27/2014	No
Pristine Sun Fund 5, LLC (2125_Jarvis)	E-SRG	Online	999	0-1.4	Solar PV	\$112.86	New	20	Butte County	8/31/2011	3/3/2013	3/3/2014	6/27/2014	No
Pristine Sun Fund 5, LLC (2127_Harris)	E-SRG	Online	1,250	0-1.8	Solar PV	\$112.86	New	20	Sutter County	8/31/2011	3/3/2013	3/3/2014	12/2/2014	No
WGL Energy Systems Inc. (Apex 646-460)	E-SRG	Online	750	0-1.1	Solar PV	\$101.32	New	20	Tulare County	4/24/2013	10/24/2014	4/24/2015	1/14/2015	No
Hollister Solar LLC (Hollister Project)	E-SRG	Online	1,500	0-2.1	Solar PV	\$101.32	New	20	San Benito County	10/25/2012	4/25/2014	4/25/2015	4/17/2015	No

Project Name	E-SRG or E-PWF	Status	Capacity (kW)	Expected GWh/yr	Technology	Price (\$/MWh)	Vintage	Term (yrs)	Location	Execution Date	18-month COD Deadline	Current GCOD**	Actual COD	Achieved COD with 18 months
Pristine Sun Fund 5, LLC (2097 Helton)	E-SRG	Online	1,500	0-2.1	Solar PV	\$112.86	New	20	Merced County	8/17/2011	2/17/2013	2/17/2014	4/30/2015	No
Merced Solar LLC (Merced Solar Project)	E-SRG	Online	1,500	0-2.1	Solar PV	\$101.32	New	20	Merced County	11/21/2012	5/21/2014	5/21/2015	5/12/2015	No
Mission Solar LLC (Mission Solar Project)	E-SRG	Online	1,500	0-2.1	Solar PV	\$101.32	New	20	Merced County	1/7/2013	7/7/2014	7/7/2015	5/23/2015	No
Bakersfield III, LLC (Bakersfield III)	E-SRG	Online	1,400	0-2.0	Solar PV	\$101.32	New	20	Kern County	8/1/2013	2/1/2015	8/1/2015	7/28/2015	No
Placer County Water Agency (Lincoln Metering and Hydroelectric Station)	E-PWF	Online	320	0-1.6	Small Hydro	\$101.32	New	20	Placer County	6/20/2013	12/20/2014	6/20/2015	9/25/2015	No
Fresno Cogeneration Partners, L.P. (Fresno Solar South)	E-SRG	Online	1,500	0-2.1	Solar PV	\$101.32	New	20	Fresno County	4/24/2013	10/24/2014	10/24/2015	10/20/2015	No
Fresno Cogeneration Partners, L.P. (Fresno Solar West)	E-SRG	Online	1,500	0-2.1	Solar PV	\$101.32	New	20	Fresno County	4/24/2013	10/24/2014	10/24/2015	10/20/2015	No
GL Sirius, LLC (Sirius Solar Project)	E-SRG	Online	999	0-2.1	Solar PV	\$101.32	New	20	Merced County	4/24/2013	10/24/2014	10/24/2015	10/22/2015	No
Green Light FIT 1, LLC (Castor Solar Project)	E-SRG	Online	1,500	0-2.1	Solar PV	\$105.09	New	20	Kern County	6/20/2013	12/20/2014	12/20/2015	4/7/2016	No
Green Light Energy Corp. (Peacock Solar Project)	E-SRG	Online	999	0-2.1	Solar PV	\$105.09	New	20	Fresno County	7/22/2013	1/22/2015	1/22/2016	2/1/2016	No
Lemoore PV 1, LLC (Lemoore 1)	E-SRG	Online	1,500	0-2.1	Solar PV	\$105.09	New	20	Kings County	8/1/2013	2/1/2015	2/1/2016	2/1/2016	No
Oroville Solar, LLC (2192 Ramirez)	E-SRG	Online	500	0-0.7	Solar PV	\$105.09	New	20	Tehama County	8/1/2013	2/1/2015	2/1/2016	2/11/2016	No
Pristine Sun Fund 6, LLC (2154 Foote)	E-SRG	Online	250	0-0.4	Solar PV	\$105.09	New	20	Butte County	8/1/2013	2/1/2015	2/1/2016	12/19/2016	No

Total Subscription (MW)

E-PWF: 4.480
E-SRG: 59.971

Key

Online
E-PWF